

Exhibit 1

Declaration of Stacey Napier

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, JANE HAMILTON,)
 SERGIO DELEON, FLOYD J. CARRIER,)
 ANNA BURNS, MICHAEL MONTEX,)
 PENNY POPE, OSCAR ORTIZ, KOBY)
 OZIAS, JOHN MELLOR-CRUMLEY, JANE)
 DOE, JOHN DOE, LEAGUE OF UNITED)
 LATIN AMERICAN CITIZENS (LULAC),)
 AND DALLAS COUNTY, TEXAS,)

Plaintiffs,

v.

RICK PERRY, Governor of Texas; and JOHN)
 STEEN, Texas Secretary of State,)

Defendants.

CIVIL ACTION NO.

2:13-CV-193 (NGR)

[Lead case]

UNITED STATES OF AMERICA,)

Plaintiffs,

TEXAS LEAGUE OF YOUNG VOTERS)
 EDUCATION FUND, IMANI CLARK,)
 AURICA WASHINGTON, CRYSTAL)
 OWENS, AND MICHELLE BESSIAKE,)

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC)
 COUNTY JUDGES AND COUNTY)
 COMMISSIONERS, HIDALGO COUNTY,)
 AND MARIA LONGORIA BENAVIDES,)

Plaintiff-Intervenors,

v.

STATE OF TEXAS, JOHN STEEN, in his)
 official capacity as Texas Secretary of State;)
 and STEVE McCRAW, in his official capacity)
 as Director of the Texas Department of Public)
 Safety,)

Defendants.

CIVIL ACTION NO.

2:13-CV-263 (NGR)

[Consolidated case]

TEXAS STATE CONFERENCE OF NAACP)
 BRANCHES; and the MEXICAN)
 AMERICAN LEGISLATIVE CAUCUS OF)
 THE TEXAS HOUSE OF)
 REPRESENTATIVES,)

Plaintiffs,)

v.)

JOHN STEEN, in his official capacity as)
 Secretary of State of Texas; and STEVE)
 McCRAW, in his official capacity as Director)
 of the Texas Department of Public Safety,)

Defendants.)

CIVIL ACTION NO.
 2:13-CV-291 (NGR)
 [Consolidated case]

BELINDA ORTIZ, LENARD TAYLOR,)
 EULALIO MENDEZ JR., LIONEL)
 ESTRADA; ESTELA GARCIA ESPINOSA,)
 ROXANNE HERNANDEZ, LYDIA LARA,)
 MARGARITO MARTINEZ LARA,)
 MAXIMINA MARTINEZ LARA, AND)
 LA UNION DEL PUEBLO ENTERO, INC.)

Plaintiffs,)

v.)

STATE OF TEXAS; JOHN STEEN, in his)
 Official capacity as Texas Secretary of State;)
 And STEVE McCRAW, in his official capacity)
 As Director of the Texas Department of)
 Public Safety,)

Defendants.)

CIVIL ACTION NO.
 2:13-CV-348 (NGR)
 [Consolidated case]

Declaration

1. My name is Stacey Napier. I am over 21 years of age and am competent to make this Declaration. I have never been convicted of a felony. I have personal knowledge of the matters set forth in this Declaration.
2. I am employed by the Texas Attorney General's Office (OAG), where I serve as Deputy Attorney General for Administration. During the trial in *Texas v. Holder*, No. 1:12-cv-128 (D.D.C.), I served as Senior Counsel to the Attorney General. I am authorized to sign this Declaration.
3. I am familiar with Texas' production logs in *Texas v. Holder*. All the documents produced by the legislative branch in *Texas v. Holder* and referenced in Texas' production logs in both *Texas v. Holder* and *Veasey v. Perry*, No. 2:13-cv-193 (S.D. Tex.) came into the possession of the OAG pursuant to the requests for legal representation of various legislators and the Texas Legislative Council during the discovery process in *Texas v. Holder*. Documents were withheld from production pursuant to the attorney client privilege and legislative privilege as referenced on the privilege logs. I swear under penalty of perjury that this statement is true and correct to the best of my knowledge.

Dated: February 28, 2014

Respectfully Submitted,



Stacey Napier

Deputy Attorney General for Administration
Office of the Texas Attorney General